

**FILED**

AUG 30 2022

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT. WESTERN DIST. OKLA.  
BY ELW DEPUTY

JERRY RAY ULRICH III,

(Enter the full name of the plaintiff.)

v.

Case No. CIV-22-767-HE  
(Court Clerk will insert case number)

(1) Chris West,

(2) Kevin Ward,

(3) Kristie Carter.

(Enter the full name of each defendant. Attach additional sheets as necessary.)

**PRO SE PRISONER CIVIL RIGHTS COMPLAINT**

Initial Instructions

1. You must type or legibly handwrite the Complaint, and you must answer all questions concisely and in the proper space. Where more space is needed to answer any question, you may attach a separate sheet.
2. You must provide a full name for each defendant and describe where that defendant resides or can be located.
3. You must send the original complaint and one copy to the Clerk of the District Court.
4. You must pay an initial fee of \$402 (including a \$350 filing fee and a \$52 administrative fee). The complaint will not be considered filed until the Clerk receives the \$402 fee or you are granted permission to proceed *in forma pauperis*.
5. If you cannot prepay the \$402 fee, you may request permission to proceed *in forma pauperis* in accordance with the procedures set forth in the Court's form application to proceed *in forma pauperis*. See 28 U.S.C. § 1915; Local Civil Rule 3.3.

- If the court grants your request, the \$52 administrative fee will not be assessed and your total filing fee will be \$350.
- You will be required to make an initial partial payment, which the court will calculate, and then prison officials will deduct the remaining balance from your prison accounts over time.
- These deductions will be made until the entire \$350 filing fee is paid, **regardless of how the court decides your case.**

7. The Court will review your complaint before deciding whether to authorize service of process on the defendants. *See* 28 U.S.C. §§ 1915(e)(2), 1915A; 42 U.S.C. § 1997e(c)(1). If the Court grants such permission, the Clerk will send you the necessary instructions and forms.

8. If you have been granted permission to proceed *in forma pauperis*, the United States Marshals Service will be authorized to serve the defendants based on information you provide. If you have not been granted permission to proceed *in forma pauperis*, you will be responsible for service of a separate summons and copy of the complaint on each defendant in accordance with Rule 4 of the Federal Rules of Civil Procedure.

### **COMPLAINT**

**I. Jurisdiction is asserted pursuant to:**

     42 U.S.C. § 1983 and 28 U.S.C. § 1343(a)(3) (NOTE: these provisions generally apply to state prisoners), or

  X   *Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics*, 403 U.S. 388 (1971), and 28 U.S.C. § 1331 (NOTE: these provisions generally apply to federal prisoners)

If you want to assert jurisdiction under different or additional statutes, list these below:

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**II. State whether you are a:**

- ☒ Convicted and sentenced state prisoner  
☐ Convicted and sentenced federal prisoner  
☒ Pretrial detainee  
☐ Immigration detainee  
☐ Civilly committed detainee  
☐ Other (please explain) \_\_\_\_\_

**III. Previous Federal Civil Actions or Appeals**

List each civil action or appeal you have brought in a federal court while you were incarcerated or detained in any facility.

**1. Prior Civil Action/Appeal No. 1**

**a. Parties to previous lawsuit:**

Plaintiff(s): \_\_\_\_\_

Defendant(s): \_\_\_\_\_

**b. Court and docket number:** \_\_\_\_\_

**c. Approximate date of filing:** \_\_\_\_\_

**d. Issues raised:** \_\_\_\_\_

**e. Disposition (for example: Did you win? Was the case dismissed? Was summary judgment entered against you? Is the case still pending? Did you appeal?):** \_\_\_\_\_

**f. Approximate date of disposition:** \_\_\_\_\_

If there is more than one civil action or appeal, describe the additional civil actions or appeals using this same format on a separate sheet(s).

#### IV. Parties to Current Lawsuit

State information about yourself and each person or company listed as a defendant in the caption (the heading) of this complaint.

1. Plaintiff

Name and any aliases: Jerry Ray Ulrich III

Address: 304 N Evans El, Reno, OK, 73036.

Inmate No.: OK. D.O.C. 675648

2. Defendant No. 1

Name and official position: Canadian County Sheriff

Chris West

Place of employment and/or residence: Canadian County Sheriff's  
Office 304 N Evans El, Reno, OK, 73036

How is this person sued? ( ) official capacity, ( ) individual capacity, ☒ both

3. Defendant No. 2

Name and official position: Canadian County Under

Sheriff Kevin Ward

Place of employment and/or residence: Canadian County Sheriff's  
Office 304 N Evans El, Reno, OK, 73036

How is this person sued? ( ) official capacity, ( ) individual capacity, ☒ both

If there are more than two defendants, describe the additional defendants using this same format on a separate sheet(s).

## IV: Parties to Current lawsuit.

Defendant No. 3

Canadian County Jail Administrator Kristle Carter

Place of employment and/or residence:

Canadian County Detention Center 304<sup>th</sup> Evans E. Reno, OK. 73036

How is this person sued? ( ) official capacity, ( ) individual capacity, ~~X~~ Both

6. Do not include claims relating to your criminal conviction or to prison disciplinary proceedings that resulted in loss of good time credits.

- If a ruling in your favor "would necessarily imply the invalidity" of a criminal conviction or prison disciplinary punishment affecting the time served, then you cannot make these claims in a civil rights complaint unless you have already had the conviction or prison disciplinary proceeding invalidated, for example through a habeas proceeding.

### Claims

List the federal right(s) that you believe have been violated, and describe what happened. Each alleged violation of a federal right should be listed separately as its own claim.

1. **Claim 1:**

(1) List the right that you believe was violated:  
*Knowledge of Sexual misconduct occurring for months while  
In the care of; Infliction of emotional stress;  
Carrigan v. Davis 70 F. Supp. 2d 448 Del 1999  
Wood v. Beauclair 692 F. 3rd 1041. 9th Cir 2012*

(2) List the defendant(s) to this claim: (If you have sued more than one defendant, specify each person or entity that is a defendant for this particular claim.)

*Canadian County Sheriff Chris West; Canadian  
County Under Sheriff Kevin Ward; Canadian County  
Jail administrator Kristie Carter.*



(3) List the supporting facts:

The news articles, The investigation reports,  
The results of the Felony Case of Rape 2<sup>nd</sup>  
degree of the officer involved. Canadian  
County incident reports.

(4) Relief requested: (State briefly exactly what you want the court to  
do for you.)

Monetary relief for sum of 1.5 million US  
Dollars.

2. Claim II:

(1) List the right that you believe was violated:

8th amendment - Cruel + Unusual Punishment.  
Not feeding state issued meals; Excessive Force  
Isolation + Targeting Retaliation

(2) List the defendant(s) to this claim: (If you have sued more than one  
defendant, specify each person or entity that is a defendant for this  
particular claim.)

Canadian County Jail administrator  
Kristie Carter; Canadian County Sheriff Chris  
West; Canadian County Under Sheriff Kevin  
Ward.

## Claims & How they tie together

Claim 1: I am suing Canadian County Sheriff Chris West, Under Sheriff Kevin Ward, and Jail administrator Kristie Carter. For Having Knowledge of Sexual misconduct allegations by their staff for 3 months according to statement given to News Channel 5 Koco April 2022; as well as to The Newspaper Yukon progress News also in April of 2022 by Sheriff Chris West. Stating "The alleged offenses dated from Dec. 1 2021 thru Feb. 8 2022". In regard to State Charges being Filed on Detention officer Raven Benson Case Number CF-2022-276 Rape in the 2<sup>nd</sup> degree. The amount of emotional and mental stress of this is beyond words. I am incarcerated and to be labeled a victim by officers, newspapers, and news channels is like painting a target on my back saying easy prey. Not to mention all the rumors staff & inmates would add to the stress regarding how the "Brass" knew I.E. snitching. Not being able to sleep, eat, or relax due to the stress was noted by Jail administrator Kristie Carter who in Feb. 2022 had nursing staff check me due to noticeably dark circles under my eyes, noticeable weight loss, and seclusion. I offered to take a drug test and said I was just extremely stressed this conversation happened in Canadian County Detention Center booking area where the nurse checked my vitals & took my weight. Which has since all improved as documented in the nursing charts of Turnkey Records. I reference said cases: Carrigan v. Davis 70. F Supp. 2<sup>nd</sup> 448 Del 1999; Wood v. Beauclair 692 F. 3<sup>rd</sup> 1041 9<sup>th</sup> Cir. 2012. More proof of facts would be all correspondence I.E. emails, texts, incident reports, and notes between Detention officer Stephany Long, Corporal Katie Wade, Major Kristie Carter, and LT. Jones Admin LT. all employed by Sheriff Chris West of Canadian County. Which I don't have access too that a court order would be needed. After accusations were made there was no separation between officer & inmate. Feb. 2022 officer was accused of having semen on her face while in kitchen. Other witnesses in whole Tucker Sellers Canadian County D.O. Brady Allen Former LT. Canadian County. D.O.



## Claims + how they tie together.

Claim 2: I am suing Canadian County Sheriff Chris West, Under Sheriff Kevin Ward, and Jail administrator Kristie Carter for violating my 8<sup>th</sup> Amendment Cruel and Unusual punishment. For Claim 1 to have happened I was targeted by Jail administrator Kristie Carter who labeled me a security threat to isolate me in Sep or Aug of 2021 then isolated even further in Dec 2021 to a Pod with only 3 cells + active prison gang members which is where the alleged rape was taken place. Which limited eyes, ears, and say so not to mention privacy which is proven by a letterhead in Canadian County Files, and approved/allowed to continue by Jail administrator Kristie Carter again proven by staff emails with instructions, regulations, + threats, as well as the need for the cells/pod we was in for females they had sleeping on the ground, + tables. let me explain they cleared many pod of females to sleep on floors + tables of other pods to move us in which was completely unnecessary given the fact we was already isolated to V-pod a lock down pod with cells 1 hour limited rec. which also is a fact pointed out in correspondence to + from Jail administrator Kristie Carter which I do not have access too but a court order would enlighten. Throughout this time Dec 2021 thru Feb 2022. The Detention Staff knew what was going on and claimed we were being favored over other inmates they would deny us state trays until we acted out as evidenced in Canadian County incident reports and write ups in the month of Jan. 2022 which I do not have access too but a court order would. In 1 instance Canadian County staff emptied O.C spray containers on us and left us in cells without showers or decontamination process in an excessively cruel and excessive exaggeration of force necessary. While my cellie Inmate Sonny Phillips suffered from documented severe C.O.P.D. with medical notation directing jail staff to remove him in the event of O.C. deployment. As well as my asthma condition been told "Hope You suffer Shouldnt have broken the law to be here, and that we were beat." They would take + hide my canteen for days. All due to Claim 1. After the alleged charges were filed Jail administrator Kristie Carter isolated

## Continuation of Claim 2

me even further moving me to a single cell AD-seg with no rec. I get a shower when I bond them for it. While through out the system I'm now labeled a victim been protected on rumor encouraged by Jail administration. In Aug of 2022 I was finally allowed in G.P. where I was again targeted by jail administrator Kristie Carter, Sheriff Chris West, and Under Sheriff Kevin Ward with another extremely exaggerated excessive force over been on a video visit with my daughter and telling the LT. No I will not step into a hall alone with you not only due to been on phone with my daughter but my emotional/mental stress of Claim 1 which instead of calling for more employees to assist, using O.C. deployment, or tazer deployment LT. Cunningham said "Don't take this personal" shut the door then returned with Canadian County Sheriff Chris West, Under Sheriff Kevin Ward, multiple Canadian County deputies all armed with AR's Assault rifles, shotguns, shields, and an M-203 grenade launcher which was used to shoot 2 individuals who camera footage will show had hands up as we all did, no threatening postures, and 0 movement. An extreme escalation that was completely uncalled for. A situation that was a 1<sup>st</sup> in Canadian County Detention Center which was biased solely cause of my name being the target, and that sets a hostile/dangerous precedent for inmates detained under these individuals. It is all a gross abuse of office, authority, and human rights. That the Constitution specifically protects all Americans from. The proof for all this is as ive said in detailed reports, emails, texts, and staff knowledge that being an inmate I have no access to, but am assured has all been filed.



(3) List the supporting facts:

Canadian County Jail incident reports, and  
Staff Current & Relieved.

(4) Relief requested: (State briefly exactly what you want the court to do for you.)

\$million us dollars monetary relief

If there are more than two claims that you wish to assert, describe the additional claims using this same format on a separate sheet(s).

#### VI. Declarations

I declare under penalty of perjury that the foregoing is true and correct.

Jerry Ulrich  
Plaintiff's signature

8-28-2022  
Date

I further declare under penalty of perjury that I placed this complaint in the prison's legal mail system, with the correct postage attached, on the 28 day of August, 2022.

Jerry Ulrich  
Plaintiff's signature

8-28-2022  
Date